

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 08 C 0446
)	
WINDY CITY IRON WORKS, INC.,)	JUDGE CHARLES R. NORGLER
an Illinois corporation,)	
)	
Defendant.)	

**MOTION FOR ENTRY OF DEFAULT AND FOR AN ORDER
DIRECTING DEFENDANT TO TURN OVER
MONTHLY FRINGE BENEFIT CONTRIBUTION REPORTS**

NOW COME Plaintiffs, by their attorneys, and move for entry of default and for an order directing WINDY CITY IRON WORKS, INC., an Illinois corporation, Defendant herein, to turn over monthly fringe benefit contribution reports due for the months of August 2007 through the present, pursuant to the Agreements and Declarations of Trust to which Defendant is bound, said Defendant having failed to answer or otherwise plead to the Complaint and the monthly contribution reports being required in order to liquidate Plaintiffs' claims.

On March 18, 2008, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Joanna Wycoska) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 7, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default.

/s/ Jennifer L. Dunitz-Geiringer _____

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Order for Reports) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of April 2008:

Mr. Vladimir Nahalka, Registered Agent/President
Windy City Iron Works, Inc.
7037 N. Hiawatha
Chicago, IL 60646

/s/ Jennifer L. Dunitz-Geiringer

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